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February 23, 2024

Hon. Judge John G. Koeltle
U.S. District Court,
Southern District of New York
U.S. Courthouse
40 Foley Square
New York, NY 10007-1581

*Time to file an Amended Complaint
stended to March 4, 2024 only. Counsel
should have filed an application earlier
and consulted with opposing counsel.*
Re: Rafalovich, Rise v. Signature Bank
Docket No. 1:23-cv-04242-J
Our File No. 4132
so ordered.
JGK

Honorable Judge Koeltle:

I am writing to respectfully ask the Court for an order, enlarging the Plaintiff's time to file an Amended Complaint. In an earlier order, dated February 6, 2024, the Court had directed that the Plaintiff file an Amended Complaint, by February 23, 2024. Unfortunately, we are unable to file this Complaint, timely, and we are compelled to ask the Court for a brief enlargement of time. This letter represents the Plaintiff's first time requesting the relief sought, herein.

Good cause exists for our request. In the recent weeks, I have prepared and filed a number of appeals, which were due, in the Appellate Divisions, Second and First Departments, alongside our various appearances, motions, and our work in the state trial courts. This office recently perfected an appeal in *Ruditskiy v. Neck Realty*, Docket No. 2023-11189, *In the Matter of the Application of Nazgul Kopbossynkyzy v. MVAIC*, Docket No. 2023-04048, *Law Office of Charles C. Destefano v. Pager*, Docket No. 2023-04573, and *Samodurova v. ConEd, et. al.*, Docket No. 2023-00512, in the Appellate Division, Second Department.

Just today, we filed an appeal in *Radutskiy v. NetCost Market, et.al.*, Docket No. 2023-11189, in the Appellate Division, Second Department, etc. We had also had substantial responsibilities towards pending cases in federal district court, in the Eastern District, involving preparation of documents and argument. All of these had become superimposed upon our daily appearances in the courts.

Regretfully, our busy schedule led to an unanticipated delay in the timely filing and serving of the Amended Complaint. We would greatly appreciate it if you would permit us 30-

day extension or so, to prepare and to file the Amended Complaint, in light of these circumstances. We believe that a short adjournment should not prejudice the defendants.

Thank you for your courtesy in considering this matter.

Respectfully submitted,

/s/William Pager

WILLIAM PAGER

cc: Friedman Kaplan Seiler & Adelman LLP
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